

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS

FILED

AUG 16 2023

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY MA DEPUTY CLERK

Thomas Daugherty Reader
(Plaintiff)

vs

SA 23CA1024 JKP
Case No. _____

Deputy Graham, Deputy Vasquez, Kerr County, TX
(Defendant)

MOTION TO PROCEED IN FORMA PAUPERIS

I, plaintiff, Thomas Daugherty Reader,
respectfully moves this Honorable Court for leave to proceed in this matter without payment of
fees, costs, or security.

Attached hereto is an affidavit in support of my motion to proceed in forma pauperis.

Respectfully submitted,

Plaintiff Thomas Daugherty Reader

Address 2036 Brian Drive

Kerrville, Texas 78028

Phone (830)285-3771

INSTRUCTIONS: Complete all questions in this affidavit and then sign it. Do not leave any blanks. If the answer to a question is "0", "none", or "not applicable (NA)", write in that response. If you need more space to answer a question or to explain your answer, attach a separate sheet of paper identified with your name, your case's docket number, and the question number.

- (a) If the answer is "YES", state the amount of your gross salary or wages per month and give the name and address of your employer.

\$ 900.00 per month

Employer DoorDash, Inc.

303 2nd St, Suite 800 San Francisco, California 94107

- (b) If the answer is "NO", state the date of last employment and the amount of the gross salary and wages per month which you received.

\$ _____ per month

Employer

2. Is your spouse presently employed? YES _____ NO X

If the answer is "YES", state the gross amount of his/her salary or wages per month and give the name and address of his/her employer.

\$_____ per month

Employer

3. Have you or your spouse received within the past twelve (12) months any money from any of the following sources:

- (a) Business, profession, or form of self-employment? YES X NO _____
- (b) Rent payment, interest or dividends? YES _____ NO X
- (c) Pensions, annuities, or life insurance payment? YES _____ NO X
- (d) Gifts or inheritances? YES _____ NO X
- (e) Any other sources? YES X NO _____

If the answer to any of the above questions is "YES", describe each source of money and state the amount received from each during the last twelve (12) months and by whom.

DoorDash is considered self-employment - \$900/mo average

I receive child support payments from NCP - \$612/mo

4. How much cash do you and your spouse have? \$ 0.

5. List any money you or your spouse have in bank accounts or in any other financial institution and the name of the financial institution.

No money in bank account

6. List the assets and the values which you or your spouse own. Do not list clothing and ordinary household furnishings.

Home Address _____

Value of Home _____

Motor Vehicle #1 Make, Year, Model Ford 2009 Focus

Value of Motor Vehicle #1 \$2,700.00

Motor Vehicle #2 Make, Year, Model _____

Value of Motor Vehicle #2 _____

7. Do you or your spouse own any other real estate, stocks, bonds, notes, automobiles, or other valuable property not listed above (excluding ordinary household furnishings and clothing)?

YES _____ NO X _____

If the answer is "YES", describe the property and state its approximate value.

8. List the persons who are dependent upon you or your spouse for support, state your relationship to those persons, and indicate how much you contribute toward their support.

Sawyer Reader - daughter - \$300/mo (100%); Ireland Reader - daughter - \$300

/mo (100%); Sutton Reader - son - \$300/mo (100%)

9. Do you expect any major changes to your spouse's monthly income or expenses or in your or your spouse's assets or liabilities during the next 12 months?

YES _____ NO X _____

If yes, describe below or on an attached sheet.

10. Estimate the average monthly expenses of you and your family. If different, list separately the amounts paid by your spouse.

Rent or home-mortgage payment \$780/mo

Utilities (electricity, heating fuel, water, sewer, and phone) \$120

Home maintenance (repairs and upkeep) _____

Food \$800 - receive state assistance

Clothing \$20

Laundry and dry-cleaning _____

Medical and dental expenses _____

Transportation (not including motor vehicle payments) _____

Recreation, entertainment, newspapers, magazines, etc. _____

Insurance (not deducted from wages or include in mortgage payments)

Homeowner's or renter's insurance _____

Life insurance _____

Health insurance _____

Motor vehicle insurance _____

Other insurance _____

Taxes (not deducted from wages or included in mortgage payments) _____

Installment payments

Motor vehicle _____

Credit card _____

Department store credit card _____

Other installment payments _____

Alimony, maintenance and support paid to others \$50/mo - Medicaid

Regular expenses for operation of business, profession, or farm (attach a detailed
statement) _____

Other expenses _____

11. Provide any other information that will help explain why you cannot pay the filing fees for your case.

I am indigent. I rely on DoorDash, child support and state assistance for my
livelihood.

I swear or affirm under penalty of perjury that, because of my poverty, I cannot prepay the filing fees of my case. I believe that I am entitled to redress. I swear or affirm under penalty of perjury under United States laws that my answers on this form are true and correct.
(28 U.S.C. 1746, 18 U.S.C. 1621)



Signature of Applicant